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Attorneys for Plaintiff Steven Malcolm

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

Steven Malcolm,

Plaintiff, Individual

v.

Acrylic Tank Manufacturing, Inc., a Nevada
company; Reynolds Polymer Technology, Inc.,
a foreign company,

Defendants.

Case No. 2-17-cv-01108-JCM-PAL

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PARTIES
TO FILE THEIR PROPOSED
DISCOVERY PLAN/SCHEDULING
ORDER AND INITIAL DISCLOSURES**

Plaintiff, Steve Malcolm by and through undersigned counsel, and Defendants Acrylic Tank Manufacturing, Inc. ("ATM") and Reynolds Polymer Technology, Inc. ("Reynolds"), by and through their undersigned counsel, (collectively "the Parties"), hereby stipulate and agree to extend the deadlines for filing the Rule 26(f) Proposed Discovery Plan/Scheduling Order and Rule 26(a)(1) Initial Disclosures up to and including July 14, 2017.

The Parties require the additional time to file their proposed discovery plan and initial disclosures because more time is needed to negotiate agreeable discovery dates due to Reynolds' pending motion to dismiss for lack of personal jurisdiction and ATM's intent to pursue a motion to

1 dismiss based upon *forum non-conveniens*. Therefore, the parties hereby stipulate and agree to
2 extend the deadlines to file their 26(f) Proposed Discovery Plan/Scheduling Order and 26(a)(1)
3 Initial Disclosures up to and including **July 14, 2017**.

4 Dated this ____ day of _____, 2017.

5 WILSON, ELSE, MOSKOWITZ,
6 EDELMAN & DICKER LLP

FORAN GLENNON PALANDECH PONZI
& RUDLOFF, PC.

7 By: Jennifer W. Arledge

8 Jennifer Willis Arledge
9 Nevada Bar No. 8729
10 James T. Tucker
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12 300 South 4th Street, 11th Floor
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14 *Attorneys for Acrylic Tank
15 Manufacturing of Nevada*

16 BARRON & PRUITT, LLP

17 By: _____

18 David Barron
19 Nevada Bar No. 142
20 John Barron
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24 *Attorney for Reynolds Polymer
25 Technology, Inc.*

By: Alaina Stephens

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Attorneys for Plaintiff Steven Malcolm

ORDER

23 IT IS SO ORDERED upon stipulation of the Parties and for good cause shown, that the
24 deadlines for filing the Rule 26(f) Proposed Discovery Plan/Scheduling Order and Rule 26(a)(1)
25 Initial Disclosures shall be **July 14, 2017**.

26 Dated: June ____, 2017.

27
28 UNITED STATES MAGISTRATE JUDGE

dismiss based upon *forum non-conveniens*. Therefore, the parties hereby stipulate and agree to extend the deadlines to file their 26(f) Proposed Discovery Plan/Scheduling Order and 26(a)(1) Initial Disclosures up to and including **July 14, 2017**.

Dated this ____ day of _____, 2017.

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EDELMA & DICKER LLP

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*Attorney for Reynolds Polymer
Technology, Inc.*

ORDER

IT IS SO ORDERED upon stipulation of the Parties and for good cause shown, that the deadlines for filing the Rule 26(f) Proposed Discovery Plan/Scheduling Order and Rule 26(a)(1) Initial Disclosures shall be **July 14, 2017**.

Dated: June 30, 2017.


UNITED STATES MAGISTRATE JUDGE